

MEMO ENDORSED

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December 1, 2023

Via ECF

The Honorable Valerie Caproni
United States District Court for the Southern District of New York
40 Foley Square, Courtroom 443
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 12/04/2023

Re: *RSS CSMC2021-ADV-DE AUR, LLC v. Adventus US Realty #4 LP, et al.*, Case No. 1:23-cv-08231-VEC (the “**Action**”)

Dear Judge Caproni:

Pursuant to Rule 2(C) of Your Honor’s Individual Practices, Defendants Adventus US Realty #4 LP, Adventus US Realty #5 LP, Adventus US Realty #6 LP, Adventus US Realty #8 LP, Adventus US Realty #11 LP, Adventus US Realty #13 LP, Adventus AOF #1 LP, Adventus AOF #2 LP, and Adventus Holdings LP (collectively, “**Defendants**”), by and through their undersigned counsel and with the consent of Plaintiff RSS CSMC2021-ADV-DE AUR, LLC (“**Plaintiff**”), hereby request (i) an adjournment of the Initial Pretrial Conference that is currently scheduled for Friday, December 15, 2023 at 10:00 a.m. (the “**IPTC**”); (ii) an extension of the December 7, 2023 deadline for the parties to file the Joint Letter and Proposed Civil Case Management Plan as required by the Court’s November 3, 2023 Order [Doc. #50]; and (iii) an extension of the deadline for Defendants to answer, move or otherwise respond to the Complaint [Doc. #1].

With respect to the IPTC, the parties have conferred and are available on the following alternate dates: February 2nd, 9th, or 16th. Accordingly, Defendants respectfully request that the Court adjourn the Initial Pretrial Conference to one of those dates or such other date, after February 2, 2024, that the Court can accommodate. In addition, Defendants respectfully request that the Court reset the deadline for the submission of the Joint Letter and proposed Civil Case Management Plan to coincide with the new date for the IPTC.

Finally, Defendants request that the deadline for Defendants to respond to the Complaint be extended from December 11, 2023 until January 31, 2024.

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The foregoing adjournment request and requested deadline extensions, which are the second such requests in this Action, are being sought to allow the parties to continue settlement discussions, which have been ongoing for over a month. The additional time afforded by the previously granted request for adjournment of the IPTC and extension of deadlines [*see* Doc. #50] has been essential in the parties' progress in their continued settlement discussions, and Defendants are hopeful additional time will facilitate complete resolution of the Action.

Respectfully,

Robert S. Berezin

Robert S. Berezin

cc: Counsel of Record (via ECF)

Application GRANTED. The Initial Pre-trial conference scheduled for Friday, December 15, 2023, at 10:00 A.M. is hereby adjourned until **Friday, February 2, 2024 at 10:00 A.M.** The parties' joint letter and proposed case management plan as set forth at Dkt. 6 are due not later than **Thursday, January 25, 2024.** Defendants' deadline to answer or otherwise respond to the Complaint is hereby extended from December 11, 2023, to **January 31, 2024.**

SO ORDERED.

Valerie Caproni 12/04/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE